

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 00-6273-CR-HUCK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ARIEL HERNANDEZ, et al.,

Defendant,

FILED
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CLARENCE S. DIST. CT.
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MOTION TO EXTEND TIME TO FILE MOTIONS

THE DEFENDANT, ARIEL HERNANDEZ, by and through the undersigned counsel, respectfully moves this Honorable Court for entry of an Order extending the time to file additional motions, and in support thereof would state:

1. As of this date, the defendant has filed a number of defensive motions. Some of these motions were complex and raised novel issues of law and fact.

2. In addition to the motions filed on behalf of this defendant, other counsel have also filed motions. To the extent possible, the various defendants have adopted relevant motions filed by each other. However, due to the complex issues presented by this case and the concurrent prosecution in State Court on inconsistent theories of prosecution, the defendant has continued his research directed toward the filing of additional defensive motions.

3. The voluminous discovery received to-date, as well as the time devoted to preparation of the motions filed already requires the defendant to request that this Court grant an additional 13 days to file additional motions.

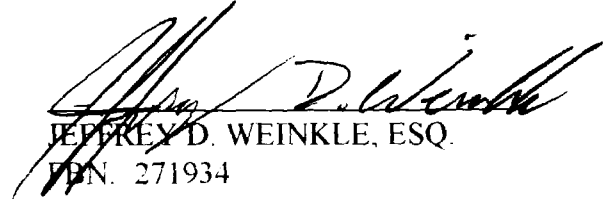
WHEREFORE, the Defendant respectfully moves this Honorable Court to enter its Order

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granting this Motion and extending the time for filing motions until April 13, 2001.

Respectfully submitted,



JEFFREY D. WEINKLE, ESQ.
FDN. 271934

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed/delivered this

30th day of March, 2001, to: UNITED STATES ATTORNEY'S OFFICE, AUSA Jeffrey

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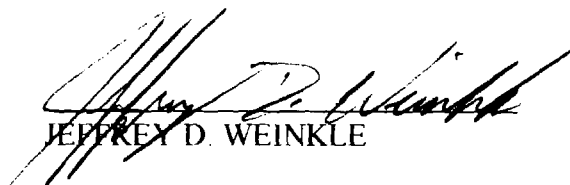
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